

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

STATE OF UTAH, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	No. 4:24-cv-00048-DN-PK
DEB HAALAND, <i>et al.</i>	)	
	)	
Defendants,	)	DECLARATION OF LINDSAY
	)	GILLHAM
SOUTHERN UTAH WILDERNESS ALLIANCE	)	
ALLIANCE and NATIONAL PARKS	)	
CONSERVATION ASSOCIATION	)	
	)	
Defendant-Intervenors.	)	


I, Lindsay Gillham, declare as follows:

1. I am employed as the NEPA Technical Lead & FAST-41 Coordinator in the Environmental Planning and Compliance Branch, Environmental Quality Division, National Park Service, in Denver, Colorado. My work address is 1 Denver Federal Center, Building 50 – NRSS EQD, Denver, CO 80225. I have held a position with the Environmental Quality Division, National Park Service, since January 2007.
2. I am the custodian of the administrative record for the actions and/or inactions under review. I am generally familiar with the documents directly or indirectly considered by the NPS decision-maker in relation to the actions and/or inactions challenged in this litigation. I am also familiar with the process by which the documents were collected and compiled into the administrative record.
3. To the best of my knowledge, the documents and information described in the updated index constitute the full administrative record of the documents that were before, and

considered indirectly or directly, by the Defendants for the actions and/or inactions under review.

4. This certification is signed under the provisions of 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 21st day of July in the City of Denver, Colorado.

/s/   
Lindsay Gillham